

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Case Number: 07-20618
Debtor(s): Dennis M. Ellis	:	
	:	Chapter Number: 13
Movant: Bank of America Corporation	:	
	:	Document No.
	:	
Respondent: No Respondent(s)	:	Hearing Date and Time:

MOTION FOR THE RECOVERY OF UNCLAIMED FUNDS

COMES NOW Bank of America Corporation, by and through its Attorney, Jardanian Josephs, Attorney at Law ("Movant") hereby petitions the Court for \$2,989.61, which is the sum of all monies being held in the registry of this court as unclaimed funds, which are due to Wilshire Credit Corp., creditor. A dividend check in the amount totaling \$2,989.61 was not negotiated by the creditor and the Trustee, pursuant to 11 U.S.C. Section 347(a), delivered the unclaimed funds to the Clerk, US Bankruptcy Court.

The creditor did not receive the dividend check in the above case for the following reason:

The original dividend check was sent to a Wilshire Credit Corp. at PO Box 8517, Portland, OR 97207. That address is no longer valid. The current address is listed below. The change in address may have prevented delivery of the original dividend check. Furthermore Wilshire Credit Corp. is a wholly owned subsidiary of Bank of America Corporation as evidenced by exhibit A.

The claimant's current mailing address, phone and social security/tax identification number are:

Bank of America Corporation
Karen Hartford Polk AVP; Recovery Solutions
401 North Tryon Street NC1-021-03-40
Charlotte, NC 28255
Phone: 980-387-5985
SSN/TIN: xx-xxx7665

Furthermore, Movant has no knowledge that this claim has been previously paid or that any party other than the claimant is entitled to these funds.

Dilks & Knopik, LLC has been appointed by Bank of America Corporation, claimant, as its Attorney-in-Fact who is duly authorized by the attached original Power of Attorney and supporting documentation to apply for these funds. Dilks & Knopik, LLC is acting through its Attorney, Jardanian Josephs, Attorney at Law, to recover these funds on behalf of Bank of America Corporation.

Movant now seeks to recover the funds from the Court's Registry. Wherefore, Movant prays that, upon proper notice to the U.S. Attorney's Office, the Court order that a check in the amount of **\$2,989.61** made payable to **Bank of America Corporation** c/o Dilks & Knopik, LLC, PO Box 2728, Issaquah, WA 98027 be issued from the Court's Registry.

Dated: January 26, 2011

Respectfully Submitted: /s/ Jardanian Josephs

Jardanian Josephs, Esquire

Pa. I.D. 88667

PO Box 22144

Pittsburgh, PA 15222-0144

Ph: (412) 979-0552

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**CERTIFICATE OF SERVICE OF
MOTION FOR THE RECOVERY OF UNCLAIMED FUNDS**

I, Jardanian Josephs, Attorney at Law, the undersigned, do declare that on January 26, 2011, I served the within Motion for the Recovery of Unclaimed Funds to the US Attorney listed below.

I further declare that I served a true and correct copy, with notice, of the within document to the following individual(s) as follows:

U.S. Attorney
Western District of Pennsylvania
US Post Office & Courthouse
700 Grant St., Ste 400
Pittsburgh, PA 15219

Office of the U.S. Trustee
Liberty Center
1001 Liberty Ave, Suite 970
Pittsburgh, PA 15222

I declare, under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 26, 2011

Respectfully Submitted: /s/ Jardanian Josephs

Jardanian Josephs, Esquire
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